

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER, Plaintiff)	
)	
)	
v.)	
)	Civil Action No. 04-11935-DPW
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.)	
Defendants)	
)	

**DEFENDANTS ANDREA CABRAL, SUFFOLK COUNTY SHERIFF'S
DEPARTMENT AND SUFFOLK COUNTY'S MOTION TO SEAL**

The Defendants Andrea Cabral, Suffolk County Sheriff's Department and Suffolk County respectfully request that this Honorable Court impound Exhibit 1 attached to its Statement of Undisputed Facts in Support of its Motion for Summary Judgment. As reasons therefore, the Defendants state that Exhibit 1, excerpts from deposition testimony of Sheila J. Porter taken on March 21, 2000, has been designated as confidential pursuant to a Protective Order.

Respectfully submitted
For Defendants Andrea Cabral, Suffolk
County Sheriff's Department and Suffolk
County
By their attorney,

/s/ Ellen M. Caulo
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Deputy General Counsel
Suffolk County Sheriff's Department
200 Nashua Street
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Date: October 19, 2005